



Registration No : F/182/Rajkot, Dated : 04-11-1976

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Registration No : Guj/277/Rajkot, Dated : 04-11-1976

# RAJKOT SAHER JILLA GRAHAK SURAKSHA MANDAL

Registered with Department of Consumer Affairs, Ministry of Consumer Affairs, Government of Gujarat &amp; India

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## COMMENTS AND SUGGESTION ON DRAFT TELECOMMUNICATION (BROADCASTING AND CABLE) SERVICES INTERCONNECTION (ADDRESSABLE SYSTEMS) (SEVENTH AMENDMENT) REGULATIONS, 2025

By

**SMT. RAMABEN R. MAVANI, EX-M.P. (LOK SABHA)**  
**PRESIDENT,**

**RAJKOT SAHER JILLA GRAHAK SURAKSHA MANDAL, RAJKOT, GUJARAT**

Key consumer-centric concerns &amp; suggestions

When evaluating regulatory amendments in the broadcasting / cable / DPO ecosystem, the consumer's interests generally revolve around these broad axes:

1. Fairness / no hidden extraction
2. Transparency / accountability
3. Service quality / reliability
4. Choice & competition / preventing capture / monopoly rent extraction
5. Redress / dispute mechanisms

I organize comments accordingly.

1. Fairness: cost burden, exemptions, and unintended pass-throughs  
Risk of cost pass-through

Audits, compliance, infrastructure segregation, and enhanced burdens cost money. DPOs may try to recover these via higher carriage or operational charges, burdening consumers.

Suggestion: TRAI should include a safeguard / capping on how much of audit / compliance costs can be passed on to subscribers, or require justification / cost disclosures when charges rise, especially in less competitive markets.

Uniform burden vs scale economies

Large DPOs may absorb compliance burdens more easily than smaller ones. The regulation should be sensitive so that it does not unduly favor already large players, thereby entrenching market concentration.



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**Suggestion:** Consider sliding scales (not just a binary exempt vs full) where audit scope or frequency is commensurate with scale, so that smaller (but >30,000) DPOs have reasonably lighter burdens compared to very large ones.

2. Transparency & accountability  
Timely sharing of audit reports

Requiring DPOs to share audit reports with broadcasters by September 30 is a good step. But for transparency to consumers, consider also requiring DPOs (or broadcasters) to publish summary audit outcomes (non-sensitive elements) publicly — e.g. percentage of mismatches, disputes raised, corrections done.

Dispute / objection resolution timeline clarity

According to the draft, broadcasters can object within 30 days; DPO must forward objections to auditor within 7 days; auditor must respond within 30 days.

VND+2Team Lease Regtech+2

But what follows if the auditor's response is unsatisfactory? What appeal or oversight mechanism exists? If a broadcaster still disputes, can there be recourse to TRAI or an independent body?

**Suggestion:** Embed an explicit escalation path (e.g. to TRAI or an independent review panel) in case of auditor / DPO / broadcaster stalemate. Also require public disclosure of dispute resolution outcomes (non-confidential summary) to build trust.

### Auditor independence and certification:

It is positive that audits must be by TRAI-empanelled auditors and require independence certificates. VND+2Team Lease Regtech+2. However, more guardrails may be needed: restrictions on auditor rotation, cooling-off periods (i.e. same auditor cannot audit same DPO consecutively indefinitely), and conflict-of-interest disclosures should be mandated.

### Advance notice & observer rights :

Giving broadcasters 30 days' notice and letting them send representatives helps oversight. Team Lease Regtech+2VND+2. But this could become a back-channel for broadcasters to influence audit. The observer's role must be clearly defined



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(what access, limitations) so that audit integrity remains. The regulation should prohibit observer interference, only observation.

### Data segregation in infrastructure sharing :

In shared infrastructure cases, the draft mandates separate SMS/CAS/DRM instances, data segregation, reconciliation, etc. VND+2Team Lease Regtech+2 This is important to prevent subscriber data leakage, cross-subsidization, or “free riding.”

**Suggestion:** Require periodic “segregation audits” to verify that data boundaries are respected. Also require DPOs to share (with TRAI or a central registry) metadata about infrastructure sharing agreements (e.g. which distributors share with whom), so consumers / oversight bodies can detect suspicious bundling or anti-competitive practices.

### 3. Service quality & reliability

Ensuring correct subscriber counts & channel access

A frequent issue for consumers is being charged for channels not delivered, or being denied channels that were promised. Better audits may reduce such mismatches, but only if audit parameters include:

1. Verifying actual “on-air / on-box” delivery to declared subscribers.
2. Random sample testing of subscriber boxes / set-top boxes.
3. Timeliness of reconciliation / correction when mismatches are found.

**Suggestion:** The regulation should explicitly require the audit scope to include field verification or end-customer box sampling so that audits are not purely system-level.

### Penalties and remedy for non-compliance :

If a DPO fails audit deadlines, broadcasters may initiate their own audit. VND+1 Yet, for consumers, there should be service-level guarantees / penalties if audit breaches reflect worse service (e.g. mismatch, incorrect billing).

**Suggestion:** Add clauses that if audit detects a shortfall in service (e.g., undelivered channels, subscriber mismatch), corresponding credits must flow to affected consumers (e.g. proportional refund) automatically.



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### Monitoring cascading effects :

If broadcasters audit or dispute, and DPOs make changes, this can lead to service disruptions or “catch-up burdens.” The regulation should require that changes arising from audits (corrective actions) do not unreasonably disrupt ongoing service, or at least require advance consumer notice.

### 4. Choice, competition & preventing concentration :

#### Preventing “audit cost barrier to entry”

If audit costs and compliance burdens become too high, new / small DPOs may be discouraged from entering, consolidating market power among large DPOs. Suggestion: In addition to the exemption threshold, consider a “transition subsidy” or simplified audit regime for start-ups / new entrants in their first few years.

### Transparency of interconnection and carriage terms :

Consumers benefit when the agreements between broadcasters and DPOs are more standard, fair, and publicly visible (where confidentiality permits). The regulation should encourage or require model / standard interconnect agreements (MIAs/SIAs) with consumer-friendly clauses, and possibly require that DPOs publish key terms (e.g. carriage charges, channel tiers, price add-ons) so that consumers can compare.

### Avoiding vertical / bundling abuses :

DPOs that own or have affiliations with broadcasters may have incentive to favor their own channels or extract “self-preferencing.” Strong audit / transparency rules help, but the regulation could explicitly prohibit unjust preferential treatment (e.g. lower carriage fees for affiliated channels) unless justified and disclosed.

### 5. Redress, oversight & consumer voice :

#### Consumer complaint / redress alignment :

While the regulation is fundamentally about DPO–broadcaster relationships, consumer interest demands that their grievances (e.g. missing channels, wrong billing) be considered in those disputes. The regulation should integrate or reference mechanisms that allow consumer agencies / grievance bodies to flag audit findings or disputes to TRAI or an oversight panel.

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### Public disclosure of aggregate performance :

Require TRAI to publish annual “audit dashboard” summarizing compliance across the sector (e.g. number of DPOs audited, number of disputes, major issues identified, average mismatch rates). This benefits consumers by shining light on systemic problems.

### Penalties / enforcement clarity :

If a DPO or auditor is noncompliant, what penalties are imposed? The draft should clearly list consequences (fines, suspension of service, disqualification from interconnection) and timelines, so the system is credible from consumer perspective.

### Sunset / review clause :

The broadcasting / distribution environment evolves (e.g. more streaming, hybrid OTT + DTH / cable). The regulation should include a mandatory review clause (say every 3 or 5 years) to revisit audit, infrastructure sharing, and consumer impact provisions.

### Risks, trade-offs & caveats from the consumer point of view :

#### Regulation overload / compliance fatigue :

Excessive regulation, even with good intent, might lead DPOs to minimize risk by limiting innovation or bundling fewer services, possibly impairing consumer choice.

#### Hidden cost inflation :

As noted, compliance costs may creep up consumer tariffs unless explicitly constrained.

#### Audit gaming / tick-box compliance :

Strict rules do not guarantee meaningful audits; as in many regulated sectors, audits may become perfunctory. The guardrails around auditor independence, rotating auditors, and field checks are critical.

#### Uneven enforcement :

If the regulatory authority lacks capacity to monitor, enforce, or verify, then the rules remain symbolic rather than effective; consumers in weaker / rural / small



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DPO areas may remain vulnerable. Thus, enforcement capacity must accompany the rules.

### Transition risk :

When shifting audit cycles (calendar year → financial year) and introducing new requirements, there may be a transition window where oversight is lax or confusion arises. The regulation should provide a transition schedule, clarity, and possibly “grace periods” for adaptation, especially for smaller DPOs.

### Suggested additional provisions (for consumer protection) :

Below is a checklist of additional provisions that TRAI could consider to strengthen the consumer benefit side:

### Audit summary disclosure to consumers

DPOs publish a non-technical summary (e.g. “number of mismatches found, corrected, unresolved”, “percentage of boxes sampled, discrepancy rate”) on their website/portal/annual report.

#### 1. Cost-pass-through constraints

Any increase in consumer tariff arising from compliance/audit costs must be pre-justified to TRAI, and capped to a defined percent per year unless independently audited for necessity.

#### 2. Consumer impact remediation

If audit detects consumer-level mismatches (e.g. channel non-delivery, wrongful billing), DPO must proactively credit or rectify without requiring consumer to file individual complaints.

#### 3. Third-party / consumer advocacy participation :

Audit supervisory committees or oversight panels should include a representative of consumer interest groups (or government consumer protection agency), who can observe or comment (without compromising confidentiality) on audit frameworks.

#### 4. Hotline / whistleblower mechanism :

Allow consumers, LCOs, or small DPOs to flag suspected misreporting or audit irregularities to TRAI anonymously, which triggers targeted audits or inspections.

#### 5. Mandatory audit of reconciliation between DPOs and broadcasters

As part of audit scope, require verifying that the actual subscriber numbers billed by DPOs align with the broadcaster’s reports, and that reconciliation processes are consistent.



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### 6. Penalty earnings to benefit consumers

Any fines or penalties imposed under the regulation (for noncompliance) should, at least in part, be directed to a consumer benefit fund (e.g. to subsidize digital inclusion, quality improvements in underserved areas) rather than general coffers.

### 7. Phased implementation & capacity building support

For smaller and medium DPOs, TRAI should provide guidance, templates, training, or partial funding support (or cost sharing) to help them upgrade systems to comply, so that consumer service is not impacted by compliance adversity.

### Suggested structure of your feedback / comment submission to TRAI

When drafting your formal comments to TRAI, you might structure them as follows:

#### 1. Introduction / Consumer Perspective

State your interest as a consumer / consumer advocate.

Summarize your key principles (transparency, fairness, redress, service quality).

#### 2. General assessment

Acknowledge positive aspects of the draft (e.g. better audit cycles, improved transparency, small DPO exemption).

Identify overall risks / consumer concerns.

#### 3. Detailed clause-wise comments

For each major draft regulation (audit timeline, exemptions, dispute resolution, infrastructure sharing, auditor rules, penalties), propose specific edits or guardrails from the consumer lens (draw from points above).

#### 4. Suggested additional provisions

Include the “additional provisions” checklist above and explain briefly how each helps safeguard consumer interest.

#### 5. Implementation / transition suggestions

Request a grace period, capacity building, training, pilot runs, or phased rollout especially for small/medium DPOs.

#### 6. Conclusion / summary of asks

Summarize your main “asks” (e.g. public audit summaries, redress obligations, independent appeals, cost pass-through caps).

**(RAMABEN R. MAVANI)**

**PRESIDENT,**

**RAJKOT SAHER JILLA GRAHAK SURAKSHA MANDAL, RAJKOT**